

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA, CHARLOTTESVILLE DIVISION

CHRISTOPHER CANTWELL,)
Plaintiff/Counter-Defendant)
v.)
EMILY GORCENSKI,)
KRISTOPHER GOAD,)
Defendants/Counter-Claimants)
)

MOTION TO STAY PROCEEDINGS

Ms. Emily Gorcenski and Mr. Kristopher Goad, Defendants/Counter-Claimants, by counsel, and with the consent of Plaintiff/Counter-Defendant Christopher Cantwell, hereby respectfully request that this Court enter an order to stay the proceedings in the above-captioned matter. In support of this request, Ms. Gorcenski and Mr. Goad state the following:

1. On December 28, 2017 Plaintiff/Counter-Defendant Cantwell filed suit in this matter against Defendants/Counter-Claimants Gorcenski and Goad;
 2. Plaintiff/Counter-Defendant Cantwell is currently awaiting trial before the Albemarle Circuit Court in the matters of Commonwealth v. Christopher Cantwell (CR17000784 and CR17000785);
 3. The claims in this matter arise from the same nucleus of operative facts as the criminal matters currently pending before the Albemarle Circuit Court;
 4. The parties agree that there is good cause to stay these proceedings pending resolution of the Plaintiff's criminal matters in state court;

5. All parties and their counsel consent to stay these proceedings until the criminal matters are resolved.

For the foregoing reasons and any others that may appear to this Court, Defendants/Counter-Claimants Emily Gorcenski and Kristopher Goad hereby request that the Court enter an order to stay all proceedings (including motions and responses thereto) until the criminal matters against the Plaintiff/Counter-Defendant are resolved.

Respectfully submitted this 18th day of July, 2018.
EMILY GORCENSKI
KRISTOPHER GOAD
By Counsel

/s/ Sandra Freeman
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Counsel for Defendants/Counter-Claimants Emily Gorcenski and Kristopher Goad

CERTIFICATE OF SERVICE

I, Sandra C. Freeman, hereby certify that I served a true and correct copy of the foregoing document upon the person(s) herein next designated, on the date shown below, by electronically delivering the same at his/her/their last known address(es), to wit:

ELMER WOODARD, Attorney for Christopher Cantwell
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Dated July 18, 2018.

/s/ Sandra C. Freeman

Sandra C. Freeman, Esq.